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Aug 31st 2018

Via ECFS
Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: In the Matter of Petition of USTelecom for Forbearance Pursuant to 47 U.S.C. Section 160(c); WC Docket No. 18-141; Category 1

Dear FCC.

The 1996 telecom and DMCA laws have ushered in an era of competition that has benefited consumers.

While imperfect in some ways, the fact is that ILEC dominance has been reduced by forcing the network to be accessible to CLEC operators.

This has not injured the ILEC profitability. Indeed, in spite of this, ILEC consolidation and profits have increased and now we find once again an AT&T of excessive size and political power.

This insincere, shrill and needless whining of poor, old AT&T is farcical. Just yesterday I was offered basic POTS service for a FAX line in a business in San Francisco at the (irony) bargain rate of only \$85/month UNLESS I ordered something else from them. The fact is that the copper network is the only truly survivable network during an earthquake. Because of FCC regulation of the PSTN over the 20th Century, this essential infrastructure, built over many years and the method over which CLECs have been able to offer unbundled DSL and voice services, is at risk of being dismantled. In a completely insincere way at that.

Now the behemoth AT&T is taking another swipe at CLECs by claiming that access to essential backhaul should be at a prohibitive rate.

In conclusion, I ask you to recall that market dominance of AT&T came over many years in which this competitive carrier operated in a 100% monopolized marketplace. Sure, the trade off was universal service in the 20th Century. But the fact that this company came to its dominance when it had total price control, guaranteed profitability monitored by various regulatory agencies nationwide cannot be ignored now.

AT&T is crying over an imagined, illegitimate and false narrative that in spite of huge profits, it is suffering from a tilted market. This simply does not ring true.

Thank you for your consideration.

William Keller